

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALTIMEO ASSET MANAGEMENT,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

QIHOO 360 TECHNOLOGY CO. LTD.,
HONGYI ZHOU, XIANGDONG QI and
ERIC X. CHEN,

Defendants.

Case No. 1:19-cv-10067-PAE

**CO-LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Co-Lead Plaintiffs Altimeo Asset Management and ODS Capital LLC (“Plaintiffs”), individually and on behalf of all Settlement Class Members, hereby move this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) certifying the proposed Settlement Class; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) setting a date for a Settlement Hearing and deadlines for the mailing and publication of the Notice, Settlement Class Member objections and opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Lead Counsel’s application for an award of attorneys’ fees and reimbursement of expenses and compensatory awards to Plaintiffs.

This motion is based upon the accompanying Memorandum of Law and Stipulation of Settlement, with its Exhibits, and the Declaration of Michael Grunfeld and the exhibits thereto that are filed contemporaneously herewith, and other such matters and argument as the Court may consider.

The Settling Defendants do not oppose the relief sought by this motion.

Dated: February 12, 2024

Respectfully submitted,

POMERANTZ LLP

/s/ Michael Grunfeld _____

Jeremy A. Lieberman

Michael Grunfeld

600 Third Avenue, 20th Floor

New York, New York 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

jalieberman@pomlaw.com

mgrunfeld@pomlaw.com

*Lead Counsel for Co-Lead Plaintiffs
Altimeo Asset Management, ODS
Capital LLC, and the Settlement Class*

LABATON SUCHAROW LLP

Carol C. Villegas

Jake Bissell-Linsk

140 Broadway

New York, New York 10005

Telephone: (212) 907-0700

Facsimile: (212) 818-0477

Email: cvillegas@labaton.com

jbissell-linsk@labaton.com

*Additional Counsel for Co-Lead Plaintiff
ODS Capital LLC*